

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Unlicensed Operation in the TV Broadcast	)	ET Docket No. 04-186
Bands	)	
	)	ET Docket No. 02-380
Additional Spectrum for Unlicensed Devices	)	
Below 900 MHz and in the 3 GHz Band	)	

**Via the ECFS**

**COMMENTS OF IEEE-USA IN SUPPORT OF MOTION FOR EXTENSION OF TIME**

IEEE-USA notes that the IEEE 802.18 Radio Regulatory Technical Advisory Group (“IEEE 802.18”) has filed a Motion, requesting that the Commission extend the deadlines for comments and reply comments in the above-captioned Proceeding (“the NPRM”) by 180 days beyond their current dates of September 1, 2004 and October 1, 2004 respectively.

IEEE-USA also supports the Commission’s goals of increasing the efficiency of spectrum utilization and bringing new broadband services to consumers and businesses.

However, as argued by IEEE 802.18 in its *Motion for Extension of Time*, we also believe that the NPRM in this Proceeding raises many complex issues and questions that require further technical studies and discussions amongst all of the stakeholders in order to develop consensus, provide both the best possible body of comment, and reduce the potential for contention in the subject Proceeding.

We believe that the cooperative effort that is going on amongst the stakeholders to pursue further technical studies and discussions, aimed at technical and regulatory solutions that will both allow practical use of the subject spectrum by license-exempt devices and assure the necessary protection of the incumbent licensed services, deserves the additional time requested to bear fruit.

We also support IEEE 802.18's contention that the requested delay will have no negative impact on the public interest and see no compelling need for the Commission to maintain the current comment and reply comment deadlines for this Proceeding, when doing so would preclude the stakeholders from having the necessary time to complete further cooperative studies and make every effort to develop broad-based consensus recommendations to the Commission.

Thus, we also believe that the Commission's goals – and the public interest – would best be served by the Commission's prompt grant of the extension of the comment and reply comment deadlines as requested by IEEE 802.18 and we also ask the Commission to grant the request without delay.

Respectfully submitted,

/s/

Russell Lefevre, Ph.D.  
Vice-President, Technology Policy Activities  
IEEE-USA  
1828 L Street, N.W.  
Washington, DC 20036

Please address correspondence relating to this document to:

Carl R. Stevenson  
Member-at-Large  
IEEE-USA CCIP  
4991 Shimerville Rd.  
Emmaus, PA 18049  
[carl.stevenson@ieee.org](mailto:carl.stevenson@ieee.org)